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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12
13 URSULA BYRAM, S.B. by and
14 through guardian ad litem TIMOTHY
15 BYRAM, N.B. by and through guardian
16 ad litem TIMOTHY BYRAM, and A.B.
17 by and through guardian ad litem
18 KAITLYN HUMENCHUK,
19 individually and as successors-in-
20 interest to Everett Byram,

21 Plaintiffs,

22 v.

23 COUNTY OF LOS ANGELES,
24 BLAKE RUNGE, and BRENDA
25 ALCANTARA,

26 Defendants.

Case No. 2:23-cv-09285-KS

**JOINT STATUS REPORT RE
STATUS OF SETTLEMENT**

[Assigned to Hon. Karen L. Stevenson,
Courtroom 580]

27 **TO THIS HONORABLE COURT:**

28 Defendants, COUNTY OF LOS ANGELES, BLAKE RUNGE and BRENDA
ALCANTARA and Plaintiffs, URSULA BYRAM, S.B. by and through guardian ad
litem TIMOTHY BYRAM, N.B. by and through guardian ad litem TIMOTHY
BYRAM and A.B. by and through guardian ad litem KAITLYN HUMENCHUK,

1 individually and as successors-in-interest to Everett Byram (“Parties”) jointly,
2 submit this status report in response to the Court's January 16, 2025 Order
3 instructing the Parties to file a joint stipulation for dismissal within 90 days.

4 **RECITALS**

5 1. On January 15, 2025, the Parties filed a Notice of Settlement requesting
6 that the Court vacate all dates in the case.

7 2. On January 16, 2025, the Court issued an Order vacating all dates and
8 instructing the Parties to file a joint stipulation for dismissal within 90 days.

9 3. The Parties fully executed the settlement agreement on January 22,
10 2025.

11 4. The settlement is conditioned upon the approval by the relevant Los
12 Angeles County boards, including the Los Angeles County Claims Board and the
13 Board of Supervisors. The process of obtaining approvals from the Los Angeles
14 County Claims Board and Board of Supervisors is expected to take 12 months from
15 the date the settlement agreement is fully executed by the parties.

16 5. The Los Angeles County Board of Supervisors has established
17 protocols in lawsuits. Where the liability of the settlement or judgment exceeds
18 \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a
19 Summary Corrective Action Plan (SCAP) (a public record) must be produced.

20 6. After the subject settlement agreement was fully executed, the
21 settlement moved on to the CAP phase. The CAP process involves several steps in
22 its preparation, including investigation, drafting, and revisions, followed by
23 approval of multiple levels of LASD personnel. The County is in the CAP process
24 phase of the approvals process.

25 7. Once the final review and signatures are completed in the CAP process,
26 the matter will be placed on the agenda for approval by the Claims Board.

27 8. After approval by the Claims Board, the matter will typically go before
28 the Board of Supervisors within approximately 60 days. After the County Board of

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Supervisors' approval, the settlement documents and Plaintiff's payment instructions will be submitted to the Los Angeles County Auditor-Controller, and then the settlement payment will be issued.

9. The Parties request the Court allow additional time for the settlement approval process to proceed.

10. Accordingly, the parties request that the Court set a status conference in approximately six (6) months so that the parties may update the Court regarding the status of the approval of the settlement.

DATED: April 16, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Cooper Alison-Mayne

DALE K. GALIPO

COOPER ALISON-MAYNE

Attorneys for Plaintiffs

DATED: April 16, 2025

HURRELL CANTRALL LLP

By: /s/ Jordan S. Stern

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